

# EXHIBIT “A”

UNITED STATES DISTRICT  
IN AND FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH, Individually Case No.  
and as Parent and Legal Guardian 2:23-cv-00118-NDF  
of W.W., K.W., G.W., and L.W.,  
minor children, and MATTHEW  
WADSWORTH,  
Plaintiffs,  
vs.  
WALMART, INC., and JETSON  
ELECTRIC BIKES, LLC,  
Defendants.

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REMOTE VIDEO DEPOSITION OF JOSEPH RAYMOND FILAS  
December 17, 2024

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APPEARANCES:

ON BEHALF OF THE PLAINTIFFS:

RUDWIN AYALA, ESQ.  
Morgan & Morgan, P.A.  
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ON BEHALF OF THE DEFENDANTS:

JARED GIROUX, ESQ.  
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ALSO PRESENT: Walter Mathern, Videographer  
Corey McMillan, Veritext Concierge

1 A. Correct.

2 MR. GIROUX: Form.

3 THE DEPONENT: Correct.

4 Q. (By Mr. Ayala) There's no evidence to  
5 suggest that she didn't attempt to put out her cigarette  
6 before exiting the shed, correct?

7 MR. GIROUX: Form.

8 THE DEPONENT: There would be no physical  
9 evidence left after that fire.

10 Q. (By Mr. Ayala) And by way of even  
11 testimony, there's no evidence to suggest that she never  
12 attempted to put out that cigarette, correct?

13 A. I would have to go back and review the  
14 deposition, but I don't -- I don't think I can review  
15 today that she said specifically whether "I extinguished  
16 the cigarette," or exactly how she extinguished the  
17 cigarette. I think there was testimony that she just,  
18 you know, discarded the cigarette in an ashtray -- one of  
19 the ashtrays.

20 Q. Have you done -- related to this case, have  
21 you done any type of testing as to this smoldering  
22 analysis of a cigarette?

23 A. I conducted thought experiments in  
24 compliance with NFPA 921. And I'm sorry, can you repeat  
25 the question again.